

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JERELLE DUNN, SAMUEL SEMPLE,
ANDRE WASHINGTON, MATTHEW
CHRISTIANSON, WILLIAM CLANTON,
SAMIR SHABAN, and MICHAEL PENA, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

-against-

THE CITY OF NEW YORK,

Defendant.

**NOTICE OF MOTION FOR
CLASS CERTIFICATION**

Case No: 21-CV-09012 (DLC)

PLEASE TAKE NOTICE that upon the accompanying Declaration of Jonathan C. Moore dated October 24, 2022, and the exhibits annexed thereto; memorandum of law, and upon all the previous pleadings and proceedings, Plaintiffs will move this Court, located at 500 Pearl Street, New York, NY 10007, at a date and time to be decided by the Court, for an order certifying a class pursuant to Rule 23 of the Federal Rules of Civil Procedure, and for such other and further relief as is just and proper.

Dated: New York, New York
October 24, 2022

BELDOCK LEVINE & HOFFMAN LLP

By: 

Jonathan C. Moore
David B. Rankin
Deema Azizi
Regina Powers

RICKNER PLLC

By: _____/s/_____

Rob Rickner
Masai I. Lord (of counsel)
Stephanie Panousieris

14 Wall Street, Suite 1603

99 Park Avenue, PH/26th Floor
New York, NY 10016
t: 212-490-0400
212-277-5825
e: jmoore@blhny.com
drankin@blhny.com
dazizi@blhny.com
rpowers@blhny.com

New York, NY 10005
t: 212-300-6506
e: rob@ricknerpllc.com
mlord@lordlawgroup.com
stephanie@ricknerpllc.com

**THE LAW OFFICE OF
CHRISTOPHER H. FITZGERALD**

By: _____/s/_____
Christopher H. Fitzgerald

14 Wall Street, Suite 1603
New York, NY 10005
t: 212-266-2275
e: CFitzgerald@CHFlegal.com

Attorneys for Plaintiffs